

**From:** Mike R King </O=PUBLIX/OU=NAMERICA/CN=RECIPIENTS/CN=XRMK>  
**To:** Pharmacies - Atl Div; David Richardson; Don Akers; Jennifer Layton; Mike Chavez; Mike Poblet; Stacy Burke; Wade Cobb; Amanda Jones; Deidre Bland; Josh Smith; Malinda Campbell; Megan Macomber; Shayla Williams  
**CC:** Betsy Severance; Anthony Stewart; Sean Klicker  
**Sent:** 11/3/2011 8:19:57 AM  
**Subject:** Q&As on C-II security paper requirements  
**Importance:** High  
**Attachments:** Memo to Pharmacists regarding security paper.pdf

Please read the below statement from Rick Allen Director, GDNA.

If you have any questions regarding CII prescriptions please contact your supervisor.

Thanks  
Mike

----- Forwarded message -----

From: "Allen, Rick" <[rallen@gdna.ga.gov](mailto:rallen@gdna.ga.gov)>  
Subject: Q&As on C-II security paper requirements  
Date: Wed, Nov 2, 2011 6:14 pm

At the request of numerous individuals, this email is being sent out with the attached Q&As on the prescription security paper for C-II controlled substances. The gist of these Q&As deals with pharmacists not needing to contact a prescriber to obtain authorization for an emergency medical need before dispensing a C-II controlled substance. There is nothing in the board policy that requires a pharmacist to call the prescriber, nor is there anything in the policy to prevent a pharmacist from writing that wording on a prescription without calling a prescriber.

This email is going out to the Medical Association of Georgia and the Medical Board so that they can let their practitioners know what pharmacists have been told.

Please do not prevent your patients to suffer needlessly by sending them back to the practitioner to get another prescription or refuse to fill a C-II prescription without the emergency medical need terminology.

The board of pharmacy policy on Security Paper and the latest approved vendor list is also attached to this email.

Please circulate this information to your pharmacists.

Thank you

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There continues to be a lot of confusion about the C-II controlled substance prescription security paper requirements.

Yes, as of October 1, 2011 the law required that whenever a prescriber issues any and all C-II controlled substance prescriptions from a pad of prescription blanks or individual sheets of paper that is given to a patient be on security paper. The manner in which any prescription is issued and given to a patient – written by hand, electronically printed or otherwise generated - does not matter – all such prescriptions must be on security paper. And – all such C-II controlled substance prescriptions – whether issued to a patient faxed to a pharmacy – must be manually signed. An electronic signature on a

However, the law does authorize the Board of Pharmacy to issue a policy which authorizes the manner in which a pharmacist may dispense emergency supplies of drugs when a C-II controlled substance prescription is not issued on security paper.

Yes, the board issued the attached policy about C-II controlled substance prescriptions that are not on security paper. This policy is in effect until December 31, 2011.

Yes, the term 'emergency medical use' or some similar term must be on any C-II controlled substance prescription if it is not issued on security paper.

Yes, the prescriber, the pharmacist or anyone can write the emergency medical need term on the prescription.

A pharmacist **does not have to call** the prescriber to determine an emergency medical need if the emergency wording is not on such a prescription when it is received by the pharmacy. The board considers it an emergency if a prescriber does not have security paper, and an emergency if a prescriber determines the need for a patient to receive a C-II controlled substance.

Please **do not prevent** a patient from getting their C-II medication because a prescription is not written on security paper.

Please **do not call** a prescriber to determine an emergency medical need for a patient.

Please **do not send** a patient back to a prescriber to have the prescriber write emergency medical need on a C-II prescription.

The three security paper requirements are the same as those for all Medicaid and Medicare prescriptions. They are as follows:

Required tamper-resistant characteristics include one or more industry-recognized features designed to:		Examples include but are not limited to:
1	Prevent unauthorized copying of a completed or blank prescription form	<ul style="list-style-type: none"> <li>· High security watermark on reverse side of blank</li> <li>· Thermochromic ink technology</li> <li>· Copied prescription blanks show the word "Copy," "Illegal," or "Void."</li> </ul>
2	Prevent erasure or modification of information written on the prescription by the prescriber	<ul style="list-style-type: none"> <li>· Tamper-resistant background ink shows erasures or attempts to change written information</li> </ul>
3	Prevent the use of counterfeit prescription forms	<ul style="list-style-type: none"> <li>· Duplicate or triplicate blanks</li> </ul>

When security paper is printed in the form of a prescription pad, each pad shall bear an identifying lot number, and each piece of paper in the pad shall be numbered sequentially beginning with the number one. The lot number and sequential numbering does not apply to sheets of paper printed out as individual prescriptions by a prescriber.

The board has created a seal of approval that confirms approved security paper contains all three industry recognized security features. The seal shall be affixed to all approved prescription security paper used in this state.

This is NO requirement for a pharmacist to copy down patient information from a driver's license. The only requirement is for the pharmacist to require the person picking up a C-II prescription to present a government issued photo identification document or other form of identification which documents legibly the full name of the person taking possession of the filled prescription.

Please circulate this information to all of your pharmacies and pharmacists,

**C. Richard 'Rick' Allen, R.Ph.**  
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